



## Chapter 2

# Partners in Permitting Service Delivery

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*To provide outstanding customer service, you must understand the dynamics of customers, suppliers and services. This chapter identifies the who of the permitting process -- those providing services and those receiving them -- and the what of the permitting process -- the services being delivered.*

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### What is the Permit Process?

The permit process encompasses all the steps in making permitting decisions, including how you write guidance or regulations, obtain and review information, oversee state and local partners, seek public input and make decisions. The ultimate product is official approval or denial for a given permit or permitting program.

### Who are the Permit Process Participants?

- EPA Headquarters
- EPA's 10 Regional offices
- State, tribal, or local government
- Permit applicant
- Interested and impacted parties

### Who are the Permit Service Providers?

The permit-service providers are EPA Headquarters, EPA Regions, and a delegated governmental permitting authority, where applicable. Permit service providers either make the permit decision, or provide services to the decision-making organization.

### What is the Relationship Between the Customers and Suppliers?

The relationship between the permit service providers and their customers is shown in Figure 2.1. The solid lines of this figure represent services provided to the customers. The dotted lines indicate opportunities for obtaining customer feedback on those services.

### What are the Services being Delivered and How are they Evaluated?

Tables 2.1 through 2.4 show the types of customer feedback you should seek for each service you provide. Don't forget to ask your customers about additional services they need that you're not

delivering.

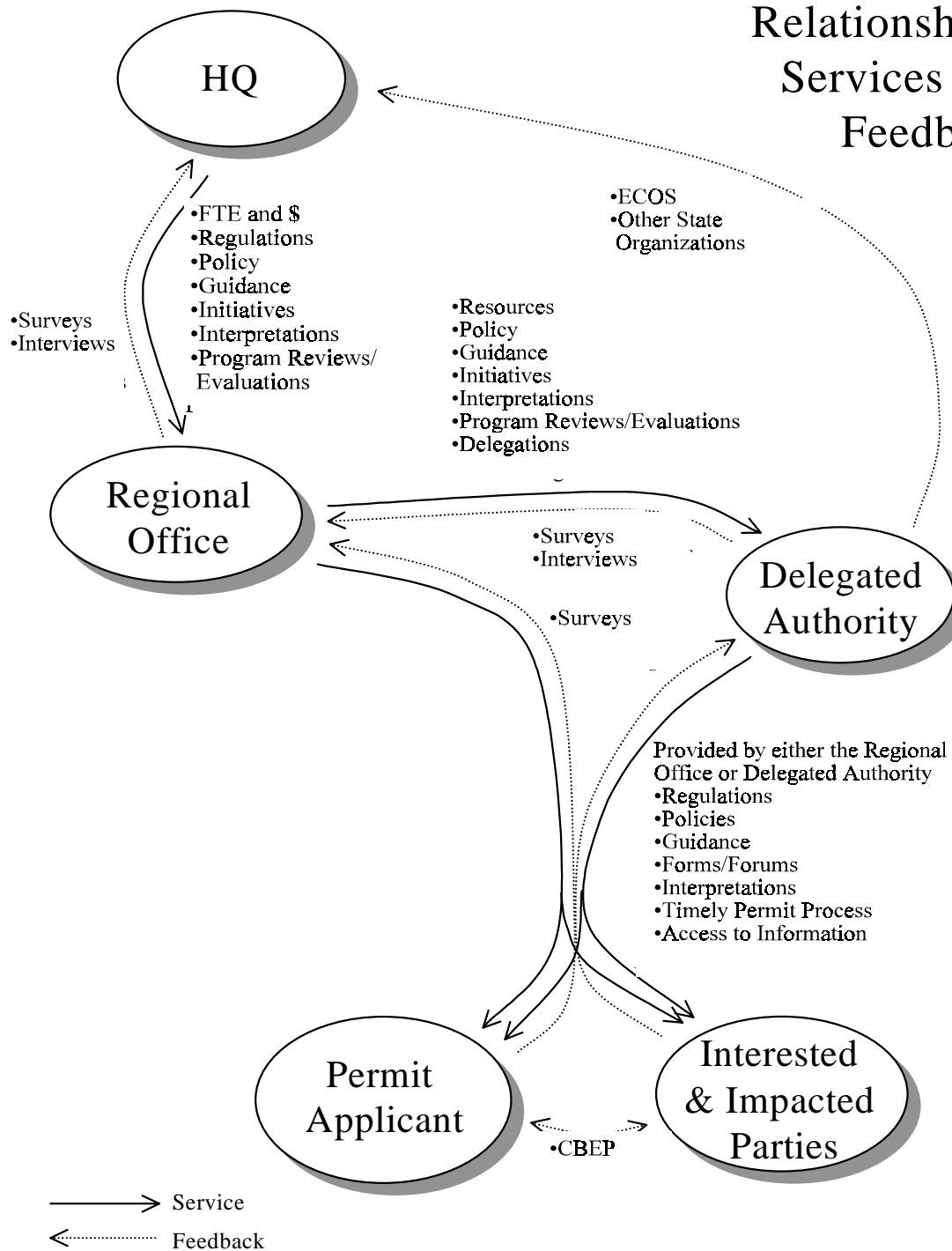
There are two special relationships shown in Figure 2.1. First is the direct feedback from delegated states to EPA Headquarters through the Environmental Council of the States (ECOS) and other state organizations. This relationship, which bypasses the Regions, often deals with higher level, non-permit-specific issues. Second is the community-based relationship between the permit applicant and the interested and impacted parties. We envision a relationship characterized by the Community Based Environmental Protection (CBEP) program, where all interested parties develop a joint environmental vision and processes to achieve it.

### **What Do I Do With The Following Tables?**

Look at the table that represents your customer-supplier situation and the services being provided. Then look at the delivery feedback needed to assess whether you are asking for the appropriate customer feedback, i.e., whether you are customer-focused. The feedback surveys of Chapter 4 should help you get this important input from your customers.

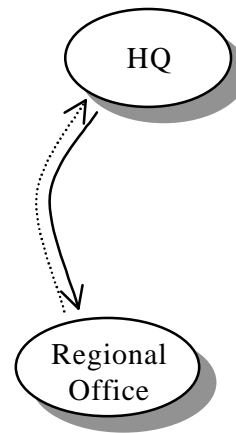
You can also “turn” these tables. When you are a customer, you should have certain expectations for the services delivered to you. If your expectations are not being met, perhaps you can start a dialogue with your service provider.

Figure 2.1  
Relationships,  
Services and  
Feedback



**Table 2.1**  
**Delivery Feedback Needed for Services Delivered**

**Service Provider:** EPA Headquarters  
**Service Customer:** EPA Regional Offices

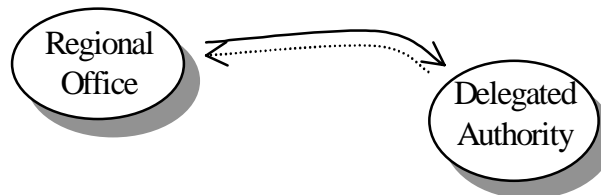


Services Provided	Delivery Feedback Needed
Resources	Was the process used to allocate resources to the Regions fair and reasonable? Do Regions want more input to the allocation process?
Regulations	Do Regions have the regulatory tools to carry out their permit programs? Seek input on regulatory reform needed.
Policy	Do Regions have the policies needed to carry out their permit programs? Are existing policies clear and useful?
Guidance	Do Regions have the necessary guidance to carry out their permit programs? Is existing guidance clear and useful?
Initiatives	What initiatives do the Regions need to carry out the permit programs? Which initiatives are counterproductive, ignored or unwanted? Seek input on initiatives' usefulness.
Interpretations	Do Regions receive timely and accurate interpretations? Assess quality of interpretations to determine whether you are meeting regional needs and expectations.
Program Reviews and Evaluations	Do Regions receive timely and accurate program reviews and evaluations? Are they useful? Assess whether you are meeting the Regions' needs and expectations.

## Table 2.2

### Delivery Feedback Needed for Services Delivered

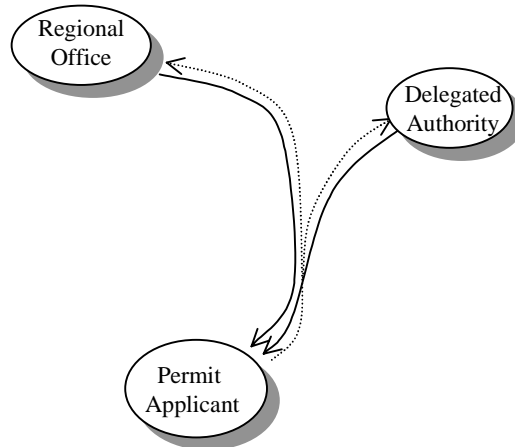
**Service Provider:** EPA Regional Offices  
**Service Customer:** Delegated Authorities (State/Tribal/Local Governments)



Services Provided	Delivery Feedback Needed
Resources	Was the process used by EPA to allocate resources fair and reasonable? Do delegated authorities want more input to the allocation process? Is NEPPS providing flexibility for the delegated authorities to allocate resources where needed?
Regulations	Are the federal regulatory tools appropriate and adequate to carry out the programs? Seek input on regulatory reform needed.
Policy	Do delegated authorities have the national or regional policies they need to carry out their permit programs? Are existing policies clear and useful?
Guidance	Do delegated authorities have the guidance they need to carry out their permit programs? Is existing guidance clear and useful?
Initiatives	What initiatives do the delegated authorities need to carry out the permit programs? Which initiatives are counterproductive, ignored or unwanted?
Interpretations	Do delegated authorities receive timely and accurate interpretations? Assess quality of interpretations to determine whether you are meeting delegated authorities' needs and expectations.
Delegation or Authorization of Programs	Are delegations/authorization application instructions clear? Is the processing of delegations/authorizations timely? Seek input on experiences with delegations/authorizations.
Program Reviews and Evaluations (Oversight)	Do delegated authorities receive timely and accurate program reviews and evaluations? Are they useful? Do they meet the needs and expectations of delegated authorities?

**Table 2.3**  
**Delivery Feedback Needed for Services Delivered**

**Service Provider:** Permit Authority (EPA Regional Office or Delegated Authority)  
**Service Customer:** Permit Applicant

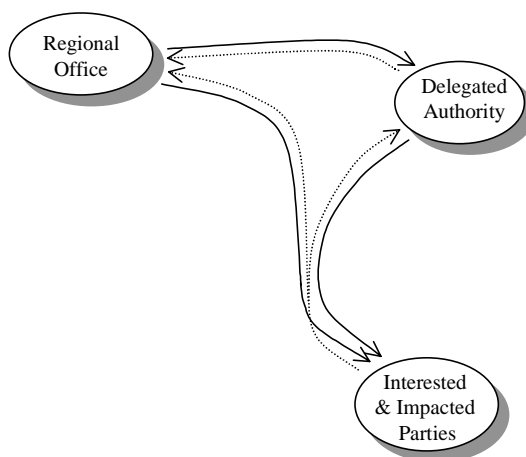


Services Provided	Delivery Feedback Needed
Regulations	Are regulations understandable and reasonable? Do they meet the permit applicant's needs? Seek input on regulatory reform needed and forward it to EPA Headquarters, as appropriate. Such feedback may lead to industry-wide or individual facility reinvention activities, such as the Common Sense Initiative (CSI), ECOS Innovations Agreement, or the XL program.
Policy	Are program policies understandable, reasonable and supportive of permit applicants' needs?
Guidance	Is permit guidance understandable, reasonable and supportive of permit applicants' needs?
Forms	Are permit application forms and instructions understandable, reasonable and supportive of permit applicants' needs?
Interpretations	Do permit applicants receive timely and accurate interpretations that meet their needs?
Timely Permit Process	Are permit decisions timely? Assess permit applicants' needs for timeliness.

## Table 2.4

### Delivery Feedback Needed for Services Delivered

**Service Provider:** Permit Authority (EPA Regional Office or Delegated Authority)  
**Service Customer:** Interested and Impacted Parties



Services Provided	Delivery Feedback Needed
Regulations	Are regulations understandable and reasonable? Do they meet the needs of interested and impacted parties? Seek input on regulatory reform needed and forward it to EPA Headquarters.
Policy	Are program policies understandable and reasonable? Do they meet the needs of interested and impacted parties?
Guidance	Is permit guidance understandable and reasonable? Does it meet the needs of interested and impacted parties?
Opportunities for Involvement	Do these parties have ample opportunity to be involved in the permitting process? What additional involvement do they need?
Forums	Are forums for public input and interaction reasonable and supportive of these customers' needs? What additional forums do they need?
Access to Information	Do these customers have access to the information they need to review and comment on the permit applications?
Interpretations	Do these customers receive timely and accurate interpretations? Are the interpretations meeting their needs and expectations?